

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

UNITED STATES of AMERICA,
vs.

Case No: 3:09-00092(02)
JUDGE HAYNES

EDGAR GIOVANI ADAME PALOMINO /

MOTION FOR RECONSIDERATION OF SENTENCE

Comes Now the Defendant Edgar Giovanni Adame Palomino by and through his undersigned counsel and respectfully files this motion requesting this Honorable Court reconsider the sentence imposed on Friday March 23, 2012. In support the undersigned would show as follows:

1. This Court recently sentenced Mr. Adame to 132 months after hearing argument from the undersigned asking for a downward departure from the guideline range of 121-151 months to the statutory mandatory minimum of 120 months and hearing from the Government their request for a sentence of 144 months.

2. The Court was openly giving consideration to giving Mr. Adame a bottom of the guideline sentence. The Court expressed sympathy to Mr. Adame being a criminal history category I and to the undersigned's argument that as a result of Mr. Adame's brother being murdered and Mr. Adame's fear for his family's safety in Mexico, his client was too frightened to cooperate and help himself. Mr. Adame spoke briefly to the Court apologizing for his conduct and